

Exhibit 1

From: R. James Slaughter
Sent: Wednesday, May 15, 2024 2:05 PM
To: jsaveri@saverilawfirm.com; czirpoli@saverilawfirm.com; cyoung@saverilawfirm.com; kmcmahon@saverilawfirm.com; acera@saverilawfirm.com; hbenon@saverilawfirm.com; wcastillo@saverilawfirm.com; mb@buttericklaw.com; bclobes@caffertyclobes.com; dmuller@venturahersey.com; NYT-AI-SG-Service@simplelists.susmangodfrey.com; Alter-AI-TT@simplelists.susmangodfrey.com; jared.briant@faegredrinker.com; Jacobson, Jeffrey S.; rgeman@lchb.com; wdozier@lchb.com; rstoler@lchb.com; ssholder@cdas.com; ccole@cdas.com; MicrosoftNYClassActionFDBR@faegredrinker.com
Cc: OpenAICopyright; openaicopyrightlitigation.lwteam@lw.com; nyclassactions_microsoft_ohs@orrick.com; NewYorkTimes_Microsoft_OHS@orrick.com; Robert Van Nest; Annette Hurst; KVP-OAI
Subject: RE: OpenAI deposition coordination

All:

I have not received any response to my May 7 email below regarding coordinating depositions. We have, however, now received a request from the In re OpenAI ChatGPT Litigation plaintiffs for a 30b6 deposition that will likely require the testimony of [REDACTED] and separately a request from the Authors Guild plaintiffs for a date for [REDACTED] deposition.

We are in the process of determining [REDACTED] availability and will be in touch regarding a date for his deposition. We have also received from the In re OpenAI ChatGPT Litigation plaintiffs a request for a date for [REDACTED] deposition. We do not know if any of the NY plaintiffs intend to take [REDACTED] deposition. Per my email below, we will only be putting our witnesses up for deposition once so we expect that plaintiffs will coordinate regarding these and other depositions.

We think it would behoove the parties to meet and confer regarding these issues. Please let us know when you are free early next week for such a conference.

Thanks,

Jamie

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From: R. James Slaughter <RSlaughter@keker.com>
Sent: Tuesday, May 7, 2024 3:04 PM

To: jsaveri@saverilawfirm.com; czirpoli@saverilawfirm.com; cyoung@saverilawfirm.com; kmcMahon@saverilawfirm.com; acera@saverilawfirm.com; hbenon@saverilawfirm.com; wcastillo@saverilawfirm.com; mb@buttericklaw.com; bclobes@caffertyclobes.com; dmuller@venturahersey.com; NYT-AI-SG-Service@simplelists.susmangodfrey.com; Alter-AI-TT@simplelists.susmangodfrey.com; jared.briant@faegredrinker.com; Jacobson, Jeffrey S. <jeffrey.jacobson@faegredrinker.com>; rgeman@lchb.com; wdozier@lchb.com; rstoler@lchb.com; ssholder@cdas.com; ccole@cdas.com; MicrosoftNYClassActionFDBR@faegredrinker.com
Cc: OpenAICopyright <OpenAICopyright@mofo.com>; openaicopyrightlitigation.lwteam@lw.com; nyclassactions_microsoft_ohs@orrick.com; NewYorkTimes_Microsoft_OHS@orrick.com; Robert Van Nest <RVanNest@keker.com>; Annette Hurst <ahurst@orrick.com>; KVP-OAI <KVPOAI@keker.com>
Subject: OpenAI deposition coordination

Counsel,

I write on behalf of the OpenAI defendants. I've addressed this email to Plaintiffs' counsel in the *In re OpenAI ChatGPT Litigation* pending in ND Cal, as well as plaintiffs' counsel in the *Authors Guild* and *NYT* cases pending in SDNY. I have also copied counsel for Microsoft. If I have left anyone off – my apologies, it was inadvertent.

As you all know, the above referenced cases involve overlapping facts, claims, issues, and defenses. The discovery sought by the various plaintiffs' groups is, not surprisingly, also overlapping. We expect that plaintiffs' counsel will seek to depose many of the same defense witnesses. We trust and expect that Plaintiffs agree that the parties should coordinate depositions to the greatest extent possible to avoid the undue burden and expense of multiple depositions of the same individual on the same issues. Along those lines, OAI intends to make its witnesses available one time, presumptively for 7 hours, which depositions may be used in all cases as if they had been taken in each case. Please confirm you are agreeable to such an approach and coordination. We would be happy to discuss as necessary.

Thanks,

Jamie

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